

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

VISIBLE SYSTEMS CORPORATION,

Plaintiff

v.

UNISYS CORPORATION,

Defendant

Civil Action No. 04-CV-11610-RGS

DEFENDANT’S PRELIMINARY RESPONSE TO PLAINTIFF’S
“EMERGENCY MOTION TO ENFORCE DISCOVERY ORDER”
AND REQUEST TO SHORTEN OPPOSITION TIME

The defendant, Unisys Corporation, has received the “emergency motion” filed yesterday by the plaintiff, and has noted plaintiff’s request that Unisys be given only three days to file its opposition. Unisys opposes plaintiff’s motion, and would like an opportunity to respond to the incorrect factual assertions and wild speculation on which it is based. In view of the July 13 deadline long ago imposed by the Court for all pre-trial filings in this matter, in anticipation of the final pre-trial conference on July 19 and the start of trial on July 23, Unisys respectfully requests that it be given until Thursday, July 12 to submit its opposition.

Defendant,
UNISYS CORPORATION,
By Its Attorneys,

____/s/ William L. Boesch
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Dated: July 10, 2007

CERTIFICATE OF SERVICE

I hereby certify that this document is being filed through the ECF system, and that I am therefore relying on the system to complete service by sending copies of the filing electronically to the necessary counsel, who are registered participants.

_____/s/ William L. Boesch_____